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By email: martin.houghton@dhsc.gov.uk

25 February 2021

Dear Martin

Re: Health Services in Teignmouth and Dawlish

Thank you for the opportunity to comment on the request for advice you have received from Devon County Council's Health and Adult Care Scrutiny Committee (OSC).

The CCG is aware of the concerns raised in the letter and will be providing a further written response at the next meeting of the Committee. Should the committee make a recommendation for formal referral the CCG is confident that consultation and clinical evidence clearly supports planned changes to health services in this area.

This letter provides some background information concerning the proposals and outlines our ongoing engagement and consultation with the community. We are disappointed that the OSC has questioned the veracity of the consultation and engagement process which we have discussed with the OSC since 2018.

For your information we have also attached the relevant papers from the CCG's Governing Body and additional clinical evidence provided to the OSC.

In summary –

- **Extensive engagement with OSC and local stakeholders has been on-going since 2013 on health and care in Teignmouth and Dawlish, the CCG has provided multiple opportunities for response and consultation.**
 - **A local stakeholder engagement group and Healthwatch supported co-production and provided oversight of the engagement and consultation process. The CCG also sought advice from the Consultation Institute who viewed the CCG's approach as good practice.**
 - **Local stakeholders and members of the community were involved in the evaluation of options both prior to consultation and post consultation.**
 - **16,000 households were invited to take part in the consultation.**
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- Over 1,000 people shared their views in the consultation with 61% supporting the overall proposal.
- The Quality and Equality Impact Assessments completed before and after the consultation process included assessments of the impact of the proposal on patient experience.
- The enhanced intermediate care provision in the Coastal Locality, which largely involves looking after people in their own homes is exemplary and has been recognised internationally as a successful model.
- The clinical case for change has been reviewed and supported by the South West Clinical Senate and NHS England.
- Recommendations from the OSC were carefully considered and resulted in additional recommendations from the Governing Body in relation to parking and transport.
- Following the stakeholder review of alternatives, the proposals were amended to move specialist ear, nose and throat clinics and specialist orthopaedic clinics to the Health and Wellbeing Centre instead of Dawlish Hospital as originally proposed.
- The CCG remains confident, based upon extensive clinical evidence alongside an engagement and consultation process conducted in line with the Gunning Principles, that the agreed proposals are in the best interests of health services in the area affected contrary to the opinion of the OSC.

1. Background information of the reconfiguration

- 1.1. For more than five years, the way in which care is delivered across the Teignmouth and Dawlish areas (Coastal Locality) has been the subject of ongoing local discussion and debate.
- 1.2. One of the aims of the CCG, in line with the Long Term Plan, is to integrate services in order to make improvements for the most vulnerable people in our communities – those needing frequent and multiple services to help and support them.
- 1.3. The options for the community and specialist clinics, day case procedures and rehabilitation provision were evaluated by the CCG, Torbay and South Devon NHS Foundation Trust, local clinicians and community groups in January 2020 using agreed criteria.
- 1.4. The extensive discussions held with the communities in the Teignmouth and Dawlish areas led to the development of the proposal for change, put to consultation from 1 September – 26 October 2020.
- 1.5. The proposal consulted upon consisted of four elements:
 1. **Move the most frequently used community clinics from Teignmouth Community Hospital to the new Health and Wellbeing Centre**
 - This includes podiatry, physiotherapy and audiology. Because they are closely related to audiology, specialist ear nose and throat services would also move to the new centre
 2. **Move specialist outpatient clinics, except ear nose and throat clinics, from Teignmouth Community Hospital to Dawlish Community Hospital, four miles away**

- These are the specialist clinics, 23 in number, that are less frequently used at Teignmouth Community Hospital, making up only 27% of total appointments there.
 - They are currently used by people from all over South Devon and Torbay as well as those from Teignmouth and Dawlish. 70% of people using them come from outside the Dawlish and Teignmouth area.
- 3. Move day case procedures from Teignmouth Community Hospital to Dawlish Community Hospital**
- This service includes minor procedures that require a specific treatment room
 - 86% of those using them come from outside the Dawlish and Teignmouth area, with more than half from Torbay
 - Journey times for many patients would increase, by up to four miles
- 4. Continue with a model of community-based intermediate care, reversing the decision to establish 12 rehabilitation beds at Teignmouth Community Hospital**
- After investment in community teams, we can now treat four times as many patients in their own homes as we could on a ward at Teignmouth Community Hospital
 - With the Nightingale Hospital established in Exeter, current analysis shows the 12 beds would not be needed for patients with COVID-19
 - The consultation document stated that if the proposal were approved, Teignmouth Community Hospital would no longer be needed for NHS services, and it would be likely to be sold by Torbay and South Devon NHS Trust, with the proceeds reinvested in the local NHS.

2. Ongoing Public Engagement

2.1. The views of all stakeholders have been key in the development of this project. A group drawn from the community has maintained oversight throughout and regular stakeholder briefings have been in place throughout the development of the project.

- **2013:** Public engagement asked people what was important to them in terms of health and care services.
- **2014/15:** Public Consultation in Teignmouth and Dawlish which led to the decision to implement:

Teignmouth Community Hospital	Dawlish Community Hospital
Health and wellbeing team	16 medical beds
12 rehabilitation beds (not implemented)	Minor Injuries Unit
Specialist outpatient clinics	Community clinics

Theatre for planned day case surgery	
Community clinics	

- **2017:** Decision by CCG Governing Body to review need for rehabilitation beds in Teignmouth Hospital as the health and wellbeing team were looking after local patients so successfully without them.
- **2018:** Public engagement asked:
 - How do you feel about bringing some health and care services together into a new building? In the context of:
 - The three Teignmouth practices wish to co-locate in a new building.
 - The opportunity a new building would provide co-location of services.
 - The success of services since the 2014/15 consultation means that the proposed 12 rehabilitation beds do not need to be established at Teignmouth Hospital.
 - What are the key factors that should be taken into account when identifying a site for any new NHS building in Teignmouth?

2.2. The consultation on the proposal was approved by the CCG Governing Body in February 2020 following consideration of a pre-consultation business case and, although due to start in March 2020, was postponed due to the COVID-19 pandemic.

2.3. The consultation took place for eight weeks across September into October 2020. The full report of Healthwatch, who undertook the consultation is appended in the Governing Body report attached.

3. Scrutiny

3.1. The below table sets out ongoing engagement with the Overview and Scrutiny Panel.

20 September 2018	Understanding the Model of Care - Community Health and Care Team Visits	(Date of visit 21 June 2018) Teignmouth Community Health & Care Team, Teignmouth Community Hospital Read the report of the visit as reported to the committee here
22 November 2018	Modernising Health and Wellbeing Services in Teignmouth	Report on the proposals to move to public consultation regarding <ul style="list-style-type: none"> • Re-locating community and specialist outpatient clinics from Teignmouth Community Hospital; • Co-locating the three GP practices in Teignmouth, alongside the

		<p>health and wellbeing team and voluntary sector in a new building;</p> <ul style="list-style-type: none"> The future of the rehabilitation beds. <p>Read the report to the committee here</p>
12 March, 2020	Health and Care: General Update	<p>Advised on deferral of consultation process.</p> <p>Read the report to the committee here</p>
10 September 2020	Consultation Modernising Health and Care Services in the Teignmouth and Dawlish area	<p>Committee considered Report on the consultation process and materials.</p> <p>“The committee commented that the quality and clarity of the consultation material widely distributed in the South Devon area which was commended by Members and the virtual arrangements as a result of the pandemic.”</p> <p>Members noted that the full analysis of the consultation outcome for the Clinical Commissioning Group would not be available until after this Committee’s next meeting.</p> <p>Read the report to the committee here</p>
12 November 2020	Modernising Health and Care Services in the Teignmouth and Dawlish area	<p>Presentation of emerging themes from the consultation.</p> <p>Read the report to the committee here</p>
14 December 2020	Spotlight Review; Modernising Health and Care Services in the Teignmouth and Dawlish area	<p>A “Spotlight Review” is a task and finish group, set up by and with councillors from the committee as members.</p> <p>Healthwatch attended and provided a report on the consultation process.</p> <p>The output of the Spotlight Review is attached and was carefully considered by NHS Devon’s Governing Body on the 17 December 2020.</p>
26 January 2021	Modernising Health and Care Services in the Teignmouth and Dawlish area	<p>CCG Representatives were called to this meeting to provide additional evidence in relation to intermediate care.</p>



		<p>Councillors agreed to write to the Independent Reconfiguration Panel to seek additional advice.</p> <p>Read the report to the committee here</p>
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4. Consultation Process

4.1. Because of the COVID-19 pandemic, and with the virus still circulating in Devon communities, the CCG made the decision to conduct the consultation remotely, thereby reducing the risks associated both with travel and with large gatherings of people.

4.2. In designing the consultation advice was sought from the Consultation Institute and acted upon. The CCG acted to ensure the widest possible awareness of the consultation, and to facilitate participation by as broad a range of people as possible.

4.3. The CCG:

- Produced a consultation document setting out the proposals and the rationale behind them.
- Sent out 16,000 consultation documents and survey forms sent by Royal Mail, to reach all households in the Teignmouth and Dawlish area.
- Created a dedicated consultation section on the CCG website with links to the consultation document, supporting documentation (including regularly updated Frequently Asked Questions), videos and the Pre-consultation Business Case
- Invited people to use the website to register as an interested stakeholder and receive regular updates, to express an interest in attending an online meeting or to invite the CCG to meet remotely with a community group to discuss the proposal at a community or consultation meeting.
- Had 133,000 leaflets delivered to postcodes in South Devon and Torbay.
- Developed an easy read and audio version of the consultation document. The CCG website also featured the support software tool, “browse aloud”, which facilitates access and participation for people with dyslexia, low literacy, English as a second language, and those with mild visual impairments by providing speech, reading, and translation. Large print and easy read versions of the core documentation were also produced.
- Ensured weekly news coverage in local media, enhanced with in-print and online advertising.
- Publicised the consultation on Twitter, with 19,999 views and 174 engagements.
- Arranged paid-for Facebook posts, which were viewed 47,153 times.
- Contacted all the schools in Teignmouth and Dawlish to request they raise awareness of the consultation via their communications within the school community.

4.4. There were a number of ways people could take part in the consultation, namely:

- Respond to the hard copy survey included in the consultation document.
- Complete the survey online.
- Attend one of six online public consultation meetings that were held.
- Watch the online consultation meeting back after the live event.



- Invite the CCG to a community meeting to discuss the proposals.
- Request a telephone appointment to have 1-1 discussions about the proposals.
- Contact Healthwatch with queries or to request further information on a freephone telephone number, Monday to Friday.
- Write (Freepost) or email with queries and/or feedback.

Subsequent to the request for advice being made and in line with our commitment to constructive relationships with local partners, meetings with the Chair of the Committee have continued and further updates will be provided to the Scrutiny Committee. It is the opinion of the CCG, based upon extensive clinical evidence and support from our Clinical Senate, alongside a engagement and consultation process conducted in line with the Gunning Principles that the agreed proposals are in the best interests of health services in the area affected.

Yours sincerely

Dr Paul Johnson

Clinical Chair, NHS Devon Clinical Commissioning Group.

